

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---------------|----|-----------------------|
| ANGELA HYMAN | : | |
| Plaintiff | : | |
| | : | CIVIL ACTION |
| v. | : | |
| | : | |
| BRYAN DEVLIN, | : | |
| Defendant | : | No. 3:17-cv-00089-KRG |
| | :: | |

**PLAINTIFF'S DESIGNATION OF
DISCOVERY EXCERPTS TO BE OFFERED AT TRIAL**

I. DEPOSITIONS

Plaintiff Angela Hyman hereby designates the following portions of deposition transcripts to be used in her case-in-chief at trial:

A. Shyree Johnson – Video Deposition

| Transcript pages: | Video time stamp: |
|-------------------|-------------------|
| 5:8-5:18 | 13:47:18-13:47:44 |
| 8:4-12:9 | 13:49:32-13:54:30 |
| 17:21-35:20 | 14:01:16-14:23:19 |
| 36:10-44:9 | 14:24:00-14:34:55 |
| 46:4-48:4 | 14:37:02-14:39:16 |
| 50:15-51:17 | 14:42:08-14:43:07 |
| 52:13-58:9 | 14:43:49-14:50:03 |
| 59:10-68:12 | 14:51:47-15:04:35 |
| 69:23-72:1 | 15:05:48-15:09:02 |

B. Other Depositions

Plaintiff reserves the right to use the following depositions taken in this manner for impeachment or other purposes allowed by the Rules:

- Bryan Devlin
- Michael Morris
- Elmer Hertzog
- Brian Black
- Jeffrey Brunner
- Angela Hyman

II. WRITTEN DISCOVERY EXERPTS

Plaintiff Angela Hyman hereby designates the following portions of written discovery responses she may use in her case-in-chief at trial:

- A. Bryan Devlin Interrogatory Responses #1, 2, 3, 4, 6, 7, 9, 17
- B. Bryan Devlin Request for Production Responses #1, 5, 9
- C. Michael Morris Interrogatory Responses #1, 2, 3, 4, 6, 7, 9, 17
- D. Michael Morris Request for Production Responses #1, 5, 9
- E. Commonwealth Defendants' Initial Rule 26(a) Disclosures

Respectfully submitted:

Dated: 1/15/2019

/s/ Andrew M. Milz
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CERTIFICATE OF SERVICE

I hereby certify that on this date, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system which sent notification of such filing to:

J. Eric Barchiesi, Esquire
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Date: 1/15/2019

/s/ Andrew M. Milz
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